

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RAYMOND A. FORSMAN,

Plaintiff,

v.

PORT OF SEATTLE, ROSS PERRY, RAY  
GIOMETTI, DELMAS WHITTAKER,  
STEPHEN AARON,

Defendants.

No. 2:19-cv-02050-RSL-MLP

STIPULATION RE JOINT REQUEST  
FOR EXTENSION OF RULE 26(A)  
DISCLOSURES AND JOINT STATUS  
REPORT

Plaintiff Raymond Forsman and Defendants PORT OF SEATTLE, ROSS PERRY,  
RAY GIOMETTI, DELMAS WHITTAKER, STEPHEN AARON, hereby stipulate as  
follows:

1. On today's date, attorney James McCanna entered a notice of appearance on  
behalf of Plaintiff Raymond Forsman. Mr. McCanna conferred with defendants'  
counsel regarding an extension of the case scheduling order deadlines via  
telephone.
2. The parties jointly request a 45-day extension of the current litigation deadlines  
to allow plaintiff's attorney to review the file and prepare for Case Schedule  
requirements.

1           3. The purpose of this extension request is not to create unnecessary delay because  
2           the parties have conferred regarding this matter and are in agreement. In light of  
3           the Mr. McCanna's Notice of Appearance, however, the extension of the current  
4           litigation deadlines will allow the parties to jointly plan litigation in the most  
5           efficient manner possible, with all necessary parties.  
6

7 Presented by:  
8

9 James McCanna  
10 McCanna Law, PLLC  
11 P.O. Box 468  
12 Kingston, WA 98346

13 /s/  
14 James McCanna, WSBA# 22565

15 AND

16 /s/ Jeremy W. Culumber  
17 Jeremy W. Culumber, WSBA #35423  
18 Attorneys for Defendants  
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20 Seattle, WA 98104  
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23 Email: jculumber@kbmlawyers.com  
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**ORDER**

This matter, having come on regularly before the Court, and the Court being fully advised, and having examined the records and files herein, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the above Stipulation re INTERVENTION AND JOINT REQUEST FOR EXTENSION OF RULE 26(a) DISCLOSURES AND JOINT STATUS REPORT is confirmed and ENTERED.

The parties will exchange Rule 26(a) initial disclosures forty-five (45) days from the date of March 18, 2020 and file their Joint Status report seven (7) days after exchanging their initial disclosures.

DATED this 16th day of March, 2020,



MICHELLE L. PETERSON  
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on March 16, 2020, I electronically filed the foregoing with the  
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to  
4 the following:

5 ***Defendants' counsel***

6  
7 Jeremy Cumber  
8 801 Second Avenue, Suite 1210  
9 Seattle, WA 98104  
Email jculumber@kbmlawyers.com:

10 DATED: March 16, 2020

11  
12 /s/ James McCanna  
13 James McCanna, WSBA #22565  
14 Attorney for Plaintiff  
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